

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

JEREMIAH HARRIS

No. 20 CR 637

Judge Manish S. Shah

**GOVERNMENT'S UNOPPOSED MOTION FOR AN EXTENSION OF TIME
TO PROVIDE RESTITUTION INFORMATION**

The UNITED STATES OF AMERICA, by and through its attorney JOHN R. LAUSCH, JR., United States Attorney for the Northern District of Illinois, moves this Court to extend the time to provide victim restitution information to the Court and the Probation Department in this case pursuant to 18 U.S.C. § 3664 and, in support thereof, states as follows:

1. The information in this case charges defendant Jeremiah Harris (“defendant”) with four counts of sexual exploitation of children, in violation of Title 18, United States Code, Section 2251(a); one count of enticement of a child, in violation of Title 18, United States Code, Section 2422(b); one count of receipt of child pornography, in violation of Title 18, United States Code, Section 2252A(a)(2)(A); and one count of travel with intent to engage in illicit sexual conduct, in violation of Title 18, United States Code, Section 2423(b).

2. On or about February 10, 2022, defendant pled guilty pursuant to a plea agreement. R. 54, 55. Defendant’s sentencing hearing is set for July 6, 2022. *Id.*

3. The government has identified several victims in this matter, and has been working to ascertain the extent of the restitution owed to the victims. The

government is seeking additional information regarding therapeutic services rendered to the victims, which it has not yet received. Therefore, the government is respectfully requesting an extension of time to provide restitution information to the Court and the Probation Department. Pursuant to 18 U.S.C. § 3664(d)(5), the government requests that time be extended to and including September 5, 2022, or until further order of the Court.

4. Undersigned counsel has conferred with the assigned probation officer in this case pursuant to 18 U.S.C. § 3664(d)(1). Probation is unopposed to the extension of time.

5. Undersigned counsel has also conferred with defense counsel, and the defense is unopposed to the proposed extension of time.

WHEREFORE, the government respectfully requests that this Court extend the time to provide restitution information, to and including September 5, 2022.

Respectfully submitted,

JOHN R. LAUSCH, JR.
United States Attorney

By: */s/ Kelly L. Guzman*
Kelly L. Guzman
Assistant U.S. Attorney
219 South Dearborn St., Rm. 500
Chicago, Illinois 60604
(312) 353-5300

Dated: July 5, 2022